framed wording of a corporate charter can be allowed to cover the wrong or to make them legal."

Sane in one State but Insane in Another.—A case involving the rights of one who had been adjudicated a lunatic in New York, and rivaling the Thaw case in interest from a legal point of view, is to be found in Chaloner *v.* Sherman, 215 Federal Reporter, 867. Chaloner was committed, by the New York Supreme Court, in 1897, on ex parte order, to the Bloomingdale Insane Asylum, and in 1899 was formally adjudged an incompetent and a committee appointed to care for his property. He subsequently escaped to Virginia, and in 1901 was there declared by proceedings in court to be of sound mind. He thereafter brought an action in the United States Circuit Court for recovery of his property from the committee, or to recover damages for its detention. It appears that he was afraid to go to the state of New York to attend the trial for fear he might be summarily seized and reincarcerated in the asylum. He thereupon applied to the federal court for a writ of protection, so that he might attend the trial in the custody of a United States marshal. This was refused by the Circuit Court, but the order was reversed by the Circuit Court of Appeals in 1908; this branch of the case being reporte under the title of Chanler *v.* Sherman, 162 Federal Reporter, 19, and the writ awarded. The more recent decision to which reference is above given is on appeal from a judgment in the District Court entered upon a directed verdict for defendant. All of Chaloner's allegations of irregularity in the insanity adjudication were held without merit, and the decision that he was mentally incompetent not subject to collateral attack. The court suggests that, if he is entitled to any remedy, he should apply to the state court to set aside the adjudication against him on the ground that he is now sane. As to how he shall proceed, and as to whether he will be compelled to risk his liberty entirely to the state authorities, does not appear.